

1 ANDRE J. CRONTHALL, Cal. Bar No. 117088  
2 FRED R. PUGLISI, Cal. Bar No. 121822  
3 CATHERINE LA TEMPA, Cal. Bar No. 162865  
4 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
5 A Limited Liability Partnership  
6 Including Professional Corporations  
7 333 South Hope Street, 48th Floor  
8 Los Angeles, California 90071-1448  
9 Telephone: 213/620-1780  
10 Facsimile: 213/620-1398  
11 Attorneys for Defendant Mid-West National Life  
12 Insurance Company of Tennessee and  
13 specially appearing Defendants UICI and  
14 UICI Marketing, Inc.

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA

15 CLYDE E. HART, an individual,

16 Plaintiff,

17 v.

18 UICI, MID-WEST NATIONAL LIFE  
19 INSURANCE COMPANY OF  
20 AMERICA, NADINE EVANS, UICI  
21 MARKETING, INC., ALLIANCE FOR  
22 AFFORDABLE SERVICES,  
23 SPECIALIZED ASSOCIATION  
24 SERVICES, CORNERSTONE  
25 AMERICA, DOES 1-50, inclusive.

23 Defendants.

CASE NO. C 06 0196

**AGREED STIPULATION  
EXTENDING DEADLINE TO  
ANSWER OR OTHERWISE  
RESPOND TO COMPLAINT**

ORDER

24 TO THE HONORABLE COURT AND ALL PARTIES HEREIN  
25 AND THEIR ATTORNEYS OF RECORD:  
26  
27  
28

1           1. Plaintiff Clyde E. Hart ("Plaintiff") and Defendants, subject to  
2 their right to arbitrate, Mid-West National Life Insurance Company of Tennessee  
3 ("Mid-West"),<sup>1</sup> the Alliance for Affordable Services (the "Alliance"), Nadine Evans  
4 ("Ms. Evans"), unnamed John Doe defendants 1-50, and specially appearing  
5 Defendants UICI, UICI Marketing, Inc. ("UICI Marketing"), and Specialized  
6 Association Services ("SAS")<sup>2</sup> (collectively, the "Defendants"), by and through  
7 their respective counsel, hereby stipulate and agree:

8  
9           2. The deadline for all Defendants to move, answer, or otherwise  
10 respond to Plaintiff's Complaint, which was removed to this Court on January 11,  
11 2006, shall be extended to February 6, 2006.

12  
13           3. Good cause exists to extend the response date and counsel for all  
14 parties have met and conferred and agree that the extension will allow the parties to  
15 focus their resources on issues relevant to this action and related actions without  
16 prejudicing any of the parties, and will preserve judicial resources and the resources  
17 of the parties.

18  
19           The parties hereby so stipulate.  
20  
21  
22  
23

24  
25 <sup>1</sup> Mid-West was improperly named in the Complaint as Mid-West National Life Insurance Company of America.

26 <sup>2</sup> This Stipulation continues Defendants UICI, UICI Marketing, and SAS's time to  
27 move, answer, or otherwise respond to the Complaint without waiving their right to  
28 challenge this Court's jurisdiction over them pursuant to, *inter alia*, Federal Rule of Civil Procedure 12(b)(2) and any right to arbitrate.


Jan 17 06 09:16a

JEFFREY OCHRACH


916-784-7099

p. 4

1 DATED: January 17, 2006 Respectfully submitted,  
2 STUART LAW FIRM

3 By   
4 Antony Stuart  
5 Attorneys For Plaintiff  
6 Clyde E. Hart  
7

8 DATED: January 17, 2006 Respectfully submitted,  
9 SHEPPARD, MULLIN, RICHTER &  
10 HAMPTON LLP

11 By   
12 ANDRE J. CRONTHALL  
13 FRED R. PUGLISI  
14 CATHERINE LA TEMPA  
15 Attorneys for Defendant Mid-West National  
16 Life Insurance Company of Tennessee and  
17 specially appearing Defendants UICI and  
18 UICI Marketing, Inc.

19 DATED: January \_\_, 2006 Respectfully submitted,  
20 MARION'S INN

21 By \_\_\_\_\_  
22 Kennedy P. Richardson  
23 Attorneys for the Alliance for  
24 Affordable Services and specially  
25 appearing Defendant SAS  
26  
27  
28

Jan 17 06 10:56a

JEFFREY OCHRACH

816-784-7099

P. 4

Jan 17 06 09:18a

JEFFREY OCHRACH

816-784-7099

P. 4

1 DATED: January 17, 2006

Respectfully submitted,

STUART LAW FIRM

2  
3  
4 By



Anthony Stuart

Attorneys For Plaintiff  
Clyde E. Hart

5  
6  
7  
8 DATED: January \_\_, 2006

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER &  
HAMPTON LLP

9  
10  
11  
12 By

ANDRE J. CRONTHALL  
FRED R. PUGLISI  
CATHERINE LA TEMPA

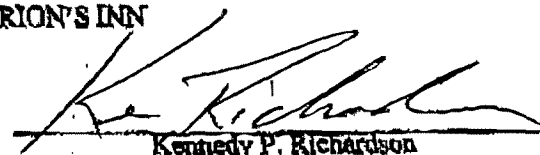
Attorneys for Defendant Mid-West National  
Life Insurance Company of Tennessee and  
specially appearing Defendants UICI and  
UICI Marketing, Inc.

13  
14  
15  
16  
17  
18 DATED: January 17, 2006

Respectfully submitted,

MARION'S INN

19  
20  
21  
22 By



Attorneys for the Alliance for  
Affordable Services and specially  
appearing Defendant SAS

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: January 17, 2006

Respectfully submitted,

THE LAW OFFICES OF JEFFREY H. OCHRACH

By

Jeffrey H. Ochrach

Attorneys for Nadine Evans

